

From: [Sierra Club Membership Services](#) on behalf of [Stacy Li](#)
To: [Scoping_Delta_Plan@Delta_Council](#)
Subject: Delta Plan Scoping Comments
Date: Monday, January 24, 2011 6:18:53 PM

Jan 24, 2011

Chair Philip Isenberg
CA

Dear Chair Isenberg,

Dear Phil:

This is an important moment for the Sacramento-San Joaquin Bay-Delta ecosystem and the Delta Stewardship Council. The Bay-Delta's ecosystem is in a state of ongoing collapse and there are concerns regarding the long-term physical stability of the Delta. Drafting a visionary and effective Delta Plan will require the careful consideration of a wide range of alternative actions, including significant new directions in water management.

The Council should clearly recognize that the Bay-Delta estuary is over-appropriated and that ecosystem restoration will require stronger flow standards and reductions in average annual diversions. I recommend that the Council use the following broad recommendations to guide the development of the draft Delta Plan and a draft EIR that analyzes a broad set of alternatives.

1. This will be your last chance to fix this and avoid massive economic disruption in California and the world. You must identify how to achieve a secure water supply and improve the Delta's ecology. Do not be distracted from these two major objectives. This will take every bit of 11 billion dollars alone to fix. You must decide appropriate actions now. Remember that it will take a decade to finish construction of this project and the existing system can fail at any moment.
2. The source for water supply must be the Sacramento River because it produces over three times the amount of water as the San Joaquin. Presently the CVP/SWP uses the San Joaquin River almost exclusively as the water supply. Unfortunately the San Joaquin River as a water source is nearing its capacity (roughly 90%). Population growth alone will soon exhaust this source of water. Furthermore, the Sacramento River water is largely unavailable under the present water export configuration because the Sacramento and San Joaquin rivers do not mix after they join.
3. San Joaquin water is too ecologically sensitive to be exported (As reflected in its ability to allow its flows to be reversed) . Let the Sacramento River provide the water supply and allow all the San Joaquin River necessary function to resist salt intrusion during the tidal cycle. Salmon and steelhead smolts cannot find the ocean because of flow reversals caused by CVP/SWP export activities. The returning salmonid adults cannot find their natal streams due to lack of attraction flows caused by inadequate instream flows and water exports. Delta smelt and longfin smelt are backwater adapted species and are

harmd by the currents caused by water export activities. Any current is bad! Threadfin shad and young of the year striped bass feed on plankton and are harmed by water exports because water exports reduces water residence time. Plankton communities need high water residence time in order to develop. If you prohibit San Joaquin water to be exported, you also prevent 1 million tons of salt immigrating into the San Joaquin Valley

4. As part of ecosystem management, enforce existing water pollution control laws: Commit to full implementation and enforcement of state and federal laws to protect both surface water and groundwater quality. The state is failing to meet existing standards to protect Bay-Delta surface water and groundwater quality, and is lagging in the development of new standards and pollutant loads needed to ensure the health of the estuary's waters. Contaminants such as salt, selenium, mercury, nutrients and pesticides pollute drinking water and damage the health of the Delta, and the damage is mounting.

5. Reducing Reliance on the Delta: Recognize that California has dramatic opportunities to invest in regional water supplies (e.g. agricultural and urban conservation, waste water recycling, groundwater management and urban storm water capture) that can allow the state to meet its future needs, while simultaneously facilitating the restoration of the Delta ecosystem. Fresno county and Kern County have yet to recharge the aquifer they depleted at the turn of the century.

6. More Water Exports Should Not be Promised before Safe Limits are Established: Existing export of fresh water flows from the Bay-Delta estuary should be contingent on ensuring sufficient water to support and restore the Bay-Delta ecosystem in perpetuity; and

7. Reduce Risks to people and property by determining a safe yield for water exports: A "water grab" that allows more water exports from the Bay-Delta estuary, ignoring the restraints of nature, expanding exports by promising unrealistic inflated quantities of water does not promote reliability, it promotes conflict. Providing water to areas south of the Delta must protect the habitat, local economies of the Sierra, Northern California, Delta and the San Joaquin River regions.

8. Water rights in California are meaningless because over-subscribed by a factor of four. California receives about 72 million acre feet of water each year. There are over 300 acre feet of various water right authorizations. Some water sources are inaccurate SWP assumes the Feather River water it sends down the Sacramento River from Oroville can be retrieved at Clifton Court. That is physically impossible due to lack of mixing at the Sacramento/San Joaquin confluence. Through Delta water conveyance is a myth.

9. Protect Taxpayers: Taxpayers and ratepayers must not be soaked again -- either through bonds or direct payments for the costs of exporting this water. Any plan adopted to export water out of the Delta from the Northern California and Sierra watersheds must be cost effective and ensure those exporting water from the Bay-Delta estuary can pay the mitigation costs, design, and capital costs. Although Congress might be persuaded to fund the fix to prevent economic disruption in the United States due to the failure of the CVP/SWP.

10. How are you going to persuade the voters that the Peripheral Canal is a necessary part of the long-term solution given its massive defeat

in 1982?

Thank you for considering the above comments. I look forward to following the work of the Council as it develops the Delta Plan.

Sincerely,

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